

EXHIBIT 7

Margo N. Uhrman

From: Moser, Christina J. <cmoser@bakerlaw.com>
Sent: Wednesday, June 9, 2021 7:16 PM
To: Margo N. Uhrman
Cc: Nathan Webb; Jeffrey Yeager; Christopher Butler; Uri Litvak; Wilcox, Deborah; Hartman, Ruth; Spring, Sarah
Subject: [EXTERNAL] Re: Drips v. Teledrip

Margo,

Drips objects to producing copies of publicly available documents. Please provide a reasoned justification for why Drips must produce them. As to the documents produced in native format, it is completely unclear what you think you are missing. Nathan asked for the native files during our call so that you could verify their dates, which we produced. I checked them myself, and the properties include the date of creation. There is nothing left for us to produce. If you want the metadata associated with the images that were previously produced or the natives produced yesterday, provide the contact information for your ediscovery coordinator so that my litigation support paralegal can talk him/her through how to load it.

Christina

On Jun 9, 2021, at 4:00 PM, Margo N. Uhrman <muhrman@hahnlaw.com> wrote:

Christina,

Thank you for producing the patent document. However, Drips has not produced the file wrapper and prosecution history for all its trademark applications, including but not limited to: Registration No. 5859200 (Conversational SMS), Application No. 88087786 (Drips logo mark), Application No. 88429504 (Drips standard character mark), Application No. 5013327 (Drip Networking), Application No. 5013327 (Drip Networking), and Application No. 90029371 (Drips.com). We asked for these documents in our third request for production. Please produce those as well.

As to the other documents, they still will not be produced in the correct format in a way that includes the date of creation and date of modification with the document. Please produce those documents with images, text, and natives in Concordance/Opticon format, with load files.

Margo

<image001.png>

Margo N. Uhrman | Associate
Hahn Loeser & Parks LLP | MORE THAN A CENTURY OF CLIENT SERVICE
Tel: (216) 274-2464 | Fax: (216) 297-4185
muhrman@hahnlaw.com | hahnlaw.com
200 Public Square, Suite 2800 | Cleveland, OH 44114

Hahn Loeser & Parks LLP is a full-service law firm with a national footprint and international reach, with offices in Cleveland, Columbus, Naples, Fort Myers, San Diego, and Chicago.

This email may contain information that is confidential or privileged, and it is intended only for the addressee(s). If you are not the intended recipient, you are prohibited from using, copying, or distributing this email, its contents, or any attachment.

From: Moser, Christina J. <cmoser@bakerlaw.com>
Sent: Tuesday, June 8, 2021 7:55 PM
To: Margo N. Uhrman <muhrman@hahnlaw.com>; Nathan Webb <NWebb@hahnlaw.com>; Jeffrey Yeager <jyeager@hahnlaw.com>; Christopher Butler <CButler@hahnlaw.com>
Cc: Uri Litvak <Ulitvak@litvaklawgroup.com>; Wilcox, Deborah <DWilcox@bakerlaw.com>; Hartman, Ruth <rhartman@bakerlaw.com>; Spring, Sarah <sspring@bakerlaw.com>
Subject: [EXTERNAL] RE: Drips v. Teledrip

Margo,

We've been working around people being out of the office, but below is a link to the patent file history as it currently stands, as well as the native versions of the marketing documents as discussed. We are following up further on some of the Campaign Builder screen shots because the versions we have don't have the original metadata. We've also included the .csv that your IS team should be able to overlay in your review platform. Note that some of the natives we are producing (the ones with entries in the "redacted" column on the far left of the .csv) are documents that we had redacted for the purpose of de-designating them – the natives however retain their original AEO designation. Given the tangential nature of the privilege log, we prioritized getting these files to you. We anticipate having the privilege log to you by the end of the week.

I'm attaching for service the amended Laible notice for June 28th as well as Drips' objections to the notice of a second Moreira deposition in violation of Rule 30.

Volume: DRIPS_010

Document: 1

Range: DRIPS034158 - DRIPS034298

FTP Link: <https://globalftp.bakerlaw.com/w/f-b5fbc705-c127-4071-816a-70b5f0135e45>

****This ftp folder and content is set to expire on 7/9/2021.**

Christina Moser

She | Her | Hers
Partner

<image007.jpg>

Key Tower
127 Public Square | Suite 2000
Cleveland, OH 44114-1214
T +1.216.861.7818

cmoser@bakerlaw.com
bakerlaw.com

<image008.png>

<image009.jpg>

<image010.jpg>

From: Margo N. Uhrman <muhrman@hahnlaw.com>

Sent: Tuesday, June 08, 2021 5:18 PM

To: Nathan Webb <NWebb@hahnlaw.com>; Moser, Christina J. <cmoser@bakerlaw.com>; Jeffrey Yeager <jyeager@hahnlaw.com>; Christopher Butler <CButler@hahnlaw.com>

Cc: Uri Litvak <ULitvak@litvaklawgroup.com>; Wilcox, Deborah <DWilcox@bakerlaw.com>; Hartman, Ruth <rhartman@bakerlaw.com>; Spring, Sarah <sspring@bakerlaw.com>

Subject: RE: Drips v. Teledrip

Christina,

Please see the attached four documents. Per the court's order, we will wait 24 hours before serving the subpoenas.

Margo

<image001.png>

Margo N. Uhrman | Associate

Hahn Loeser & Parks LLP | MORE THAN A CENTURY OF CLIENT SERVICE

Tel: (216) 274-2464 | Fax: (216) 297-4185

muhrman@hahnlaw.com | hahnlaw.com

200 Public Square, Suite 2800 | Cleveland, OH 44114

Hahn Loeser & Parks LLP is a full-service law firm with a national footprint and international reach, with offices in Cleveland, Columbus, Naples, Fort Myers, San Diego, and Chicago.

This email may contain information that is confidential or privileged, and it is intended only for the addressee(s). If you are not the intended recipient, you are prohibited from using, copying, or distributing this email, its contents, or any attachment.

From: Nathan Webb <NWebb@hahnlaw.com>

Sent: Tuesday, June 8, 2021 5:00 PM

To: Margo N. Uhrman <muhrman@hahnlaw.com>; Moser, Christina J. <cmoser@bakerlaw.com>; Jeffrey Yeager <jyeager@hahnlaw.com>; Christopher Butler <CButler@hahnlaw.com>

Cc: Uri Litvak <ULitvak@litvaklawgroup.com>; Wilcox, Deborah <DWilcox@bakerlaw.com>; Hartman, Ruth <rhartman@bakerlaw.com>; Spring, Sarah <sspring@bakerlaw.com>

Subject: RE: Drips v. Teledrip

Christina:

We are fine moving Mr. Christopher's deposition to July 9, and will send an amended Notice soon. We will also be deposing Mr. Ghaneian on July 9 as well.

Regarding Mr. Liable's deposition, I don't believe that you've responded to our 5/26 email regarding his scheduling conflict and proposed deposition scheduling on June 28 instead, which seems even more appropriate now given the depositions agreed to on June 23 and 25 in Cleveland. Please confirm this new date works.

Please let me know if a telephone call to finalize deposition scheduling issues would be helpful.

Regards,

<image020.png>

Nathan B. Webb | Partner
Hahn Loeser & Parks LLP
Tel: (216) 274-2222 | Fax: (330) 208-4594
NWebb@hahnlaw.com | hahnlaw.com
200 Public Square, Suite 2800, Cleveland, Ohio USA

Hahn Loeser & Parks LLP is a full-service law firm with a national footprint and international reach, with offices in Cleveland, Columbus, Naples, Fort Myers, San Diego, and Chicago.

This email may contain information that is confidential or privileged, and it is intended only for the addressee(s). If you are not the intended recipient, you are prohibited from using, copying, or distributing this email, its contents, or any attachment.

From: Margo N. Uhrman <muhrman@hahnlaw.com>
Sent: Tuesday, June 8, 2021 9:11 AM
To: Moser, Christina J. <cmoser@bakerlaw.com>; Nathan Webb <NWebb@hahnlaw.com>; Jeffrey Yeager <jyeager@hahnlaw.com>; Christopher Butler <CButler@hahnlaw.com>
Cc: Uri Litvak <ULitvak@litvaklawgroup.com>; Wilcox, Deborah <DWilcox@bakerlaw.com>; Hartman, Ruth <rhartman@bakerlaw.com>; Spring, Sarah <sspring@bakerlaw.com>
Subject: RE: Drips v. Teledrip

Christina,

We accept your proposed dates of June 23 for Martindale and June 25 for the 30(b)(6). Revised deposition notices are attached.

We will get back to you on the other issues shortly.

Margo

<image001.png>

Margo N. Uhrman | Associate
Hahn Loeser & Parks LLP | MORE THAN A CENTURY OF CLIENT SERVICE
Tel: (216) 274-2464 | Fax: (216) 297-4185
muhrman@hahnlaw.com | hahnlaw.com
200 Public Square, Suite 2800 | Cleveland, OH 44114

Hahn Loeser & Parks LLP is a full-service law firm with a national footprint and international reach, with offices in Cleveland, Columbus, Naples, Fort Myers, San Diego, and Chicago.

This email may contain information that is confidential or privileged, and it is intended only for the addressee(s). If you are not the intended recipient, you are prohibited from using, copying, or distributing this email, its contents, or any attachment.

From: Moser, Christina J. <cmoser@bakerlaw.com>
Sent: Monday, June 7, 2021 1:36 PM
To: Nathan Webb <NWebb@hahnlaw.com>; Margo N. Uhrman <muhrman@hahnlaw.com>; Jeffrey Yeager <jyeager@hahnlaw.com>; Christopher Butler <CButler@hahnlaw.com>
Cc: Uri Litvak <Ulitvak@litvaklawgroup.com>; Wilcox, Deborah <DWilcox@bakerlaw.com>; Hartman, Ruth <rhartman@bakerlaw.com>; Spring, Sarah <sspring@bakerlaw.com>
Subject: [EXTERNAL] RE: Drips v. Teledrip

Nathan,

Your accusations of gamesmanship on the part of Drips is ironic. While your email attempts to re-write history, the correspondence between the parties on these issues is clear.

Regarding the deposition dates proposed by Teledrip on May 26, I wrote on May 27: "Due to the delay in Teledrip providing these dates, I am confirming with my client that the witnesses are still available." Due to my work schedule, time differences, and my client's schedules, we weren't able to confirm the conflicts with Teledrip's proposed dates and find alternate dates until Friday evening.

As to Mr. Evans' deposition, specifically, we originally proposed the June 28-July 1 availability on April 26. At that time, I wrote "Let us know ASAP which of those dates work so we can put them in our calendar." Teledrip did not confirm those dates. I wrote again on May 19 "Both Mr. Evans and I have to get this on our schedules as soon as possible due to other demands on our time." Still, Teledrip waited a week to get back to us. The fact that a third party witness is also scheduled for July 8 or 9 is irrelevant when Teledrip has at least two partners who have been participating in taking and defending depositions in this case. Moreover, Mr. Ghaneian's deposition is not scheduled to start until 4 pm on July 9th and Drips does not consent to Teledrip taking Mr. Moreira's deposition a second time. Thus, the subpoena to Mr. Moreira violates Rule 30.

On Mr. Martindale's June 10 deposition, that was confirmed more than a month ago and never cancelled. While we had discussed also conducting the Drips 30b6 during the same period (which discussion was had solely because Teledrip had indicated it wanted to discuss settlement and needed Drips' 30b6 first), Teledrip never provided Drips any proposed topics despite multiple demands from Drips. Therefore, on May 20, I wrote "**Regarding the Drips 30(b)(6) deposition**, at this point Teledrip is proposing to give Drips less than two weeks to prepare its witness on unknown topics. We cannot do that. Drips gave Teledrip seven months to prepare, and Mr. Murray was still unable to answer questions on basic issues in the case. We can schedule **the 30(b)(6)** for June 22 or 23 in Ohio provided we receive Teledrip's topics tomorrow." (emphasis added).

We are willing to schedule Mr. Martindale's personal deposition for June 23 and the 30b6 for June 25 in Cleveland. Mr. Evans' deposition can be taken July 8 or July 9.

Christina Moser

She | Her | Hers
Partner

<image021.jpg>

Key Tower

127 Public Square | Suite 2000

Cleveland, OH 44114-1214

T +1.216.861.7818

cmoser@bakerlaw.com

bakerlaw.com

<image022.png>

<image023.jpg>

<image024.jpg>

From: Nathan Webb <NWebb@hahnlaw.com>

Sent: Monday, June 07, 2021 10:09 AM

To: Moser, Christina J. <cmoser@bakerlaw.com>; Margo N. Uhrman <muhrman@hahnlaw.com>; Jeffrey Yeager <jyeager@hahnlaw.com>; Christopher Butler <CButler@hahnlaw.com>

Cc: Uri Litvak <Ulitvak@litvaklawgroup.com>; Wilcox, Deborah <DWilcox@bakerlaw.com>; Hartman, Ruth <rhartman@bakerlaw.com>; Spring, Sarah <sspring@bakerlaw.com>

Subject: RE: Drips v. Teledrip

[External Email: Use caution when clicking on links or opening attachments.]

Christina:

This transparent gamesmanship, sent at midnight on a Friday night, is not appreciated. On May 20, you rejected the previously discussed scheduling of the Martindale and Drips 30(b)(6) depositions on June 9 and 10, and offered June 22-23 as alternative dates. On May 26 we served notices of the Martindale and Drips 30(b)(6) depositions, and the next day you indicated that these deposition dates “should work.” Eight days later, on Saturday June 5, I received your—literal—eleventh hour email message seeking to cancel the offered, and noticed, deposition dates and instead demanding that I appear for Martindale’s deposition on five days’ notice in California. This is completely unacceptable. Martindale is an officer of an Ohio plaintiff that filed the case in Ohio. I have already scheduled over the previously discussed June 10 deposition date. I am willing to re-arrange these deposition dates to May 23 and 24th (or perhaps even the 25th) at our offices in Cleveland to accommodate your prep day, but otherwise will be forced to move the Court to compel Martindale’s attendance.

Similarly, you are now refusing to produce Evans on a date previously offered for his deposition (having already refused to schedule him until the last two weeks of the discovery period), and are now offering to produce him on two dates that we have already scheduled other depositions. This, too, is unacceptable.

Please let me know what times this afternoon or tomorrow morning you can meet to confer on these issues.

Regards,

<image025.png>

Nathan B. Webb | Partner
Hahn Loeser & Parks LLP
Tel: (216) 274-2222 | Fax: (330) 208-4594
NWebb@hahnlaw.com | hahnlaw.com
200 Public Square, Suite 2800, Cleveland, Ohio USA

Hahn Loeser & Parks LLP is a full-service law firm with a national footprint and international reach, with offices in Cleveland, Columbus, Naples, Fort Myers, San Diego, and Chicago.

This email may contain information that is confidential or privileged, and it is intended only for the addressee(s). If you are not the intended recipient, you are prohibited from using, copying, or distributing this email, its contents, or any attachment.

From: Moser, Christina J. <cmoser@bakerlaw.com>
Sent: Friday, June 4, 2021 11:51 PM
To: Margo N. Uhrman <muhrman@hahnlaw.com>; Nathan Webb <NWebb@hahnlaw.com>; Jeffrey Yeager <jyeager@hahnlaw.com>; Christopher Butler <CButler@hahnlaw.com>
Cc: Uri Litvak <Ulitvak@litvaklawgroup.com>; Wilcox, Deborah <DWilcox@bakerlaw.com>; Hartman, Ruth <rhartman@bakerlaw.com>; Spring, Sarah <sspring@bakerlaw.com>
Subject: [EXTERNAL] Drips v. Teledrip

Counsel,

Please see attached for service.

Per my email last Thursday, I have followed up with my client regarding the proposed deposition dates. We cannot agree to conduct Mr. Martindale's personal deposition on June 22, as he is scheduled to be Drips' 30(b)(6) witness on June 23. Mr. Martindale's schedule (and counsel's travel schedule) requires that we have June 22 to prep Mr. Martindale in Ohio. Both Mr. Martindale and counsel made significant adjustments to their travel plans and schedules to accommodate the long-established plans to take Mr. Martindale's deposition in California on June 10. Please confirm that the deposition will be proceeding on June 10 as originally planned. Also, Mr. Evans will not be in town on July 1. He can be available July 8 or 9 for deposition.

Christina Moser
She | Her | Hers
Partner

<image026.jpg>
Key Tower
127 Public Square | Suite 2000
Cleveland, OH 44114-1214
T +1.216.861.7818

cmoser@bakerlaw.com
bakerlaw.com

<image027.png>

<image028.jpg>

<image029.jpg>

This email is intended only for the use of the party to which it is addressed and may contain information that is privileged, confidential, or protected by law. If you are not the intended recipient you are hereby notified that any dissemination, copying or distribution of this email or its contents is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.

Any tax advice in this email is for information purposes only. The content of this email is limited to the matters specifically addressed herein and may not contain a full description of all relevant facts or a complete analysis of all relevant issues or authorities.

Internet communications are not assured to be secure or clear of inaccuracies as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Therefore, we do not accept responsibility for any errors or omissions that are present in this email, or any attachment, that have arisen as a result of e-mail transmission.

*****NOTICE*** This came from an external source. Use caution when replying, clicking links, or opening attachments.**

*****NOTICE*** This came from an external source. Use caution when replying, clicking links, or opening attachments.**

*****NOTICE*** This came from an external source. Use caution when replying, clicking links, or opening attachments.**

*****NOTICE*** This came from an external source. Use caution when replying, clicking links, or opening attachments.**